

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**ROBERT RAMOS,  
an individual,**

**PLAINTIFF,**

**V.**

**THREE STAR VENTURE #2 LLC,**

**a limited liability company, and  
WGJI13 BUSINESS LLC,  
a limited liability company,  
DEFENDANTS.**

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**CASE NO. 5:22-CV-172-DAE**

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**PROPOSED INJUNCTION**

NOW COMES Plaintiff Robert Ramos (“Ramos” or “Plaintiff”). Ramos brings to the Court’s attention that Defendant has not filed an answer to Plaintiff’s Amended Complaint or a response to Plaintiff’s Motion for Default Judgment or otherwise appeared in this lawsuit. For this reason, Ramos requests this Court issue an Injunction ordering the Defendant complete the following repairs within one hundred eighty (180) days of the entry of this order:

1. The addition of an ADA compliant, van accessible parking space in the parking facility serving the Subject Property pursuant to Section 4.6 of the 1991 ADAAG and Section 502 of the 2010 ADAAG.
2. The addition of an accessible route from the newly created van accessible parking space to the entrance of the subject property including the addition of curb stops to other parking spaces along the accessible route to prevent parked vehicles from protruding into the accessible route pursuant to Section 4.3 of the 1991 ADAAG and Section 403.5.1 of the 2010 ADAAG.

3. The addition of signage denoting each designated accessible space and designated accessible van space as such pursuant to Section 4.6 of the 1991 ADAAG and Sections 208, 302 and 502 of the 2010 ADAAG.
4. Re-striping of the parking lot to denote designated accessible spaces, designated accessible van spaces, and access aisles as such 28 CFR § 36.211, Section 4.6 of the 1991 ADAAG, and Section 502.3.3 of the 2010 ADAAG.
5. The addition of an accessible route from the entrance of the business to the public sidewalk serving the subject property pursuant to Section 4.3.2 of the 1991 ADAAG and Section 206.2.1 of the 2010 ADAAG.
6. The repair of all pavement within and leveling of all designated accessible parking spaces and designated van accessible parking spaces pursuant to 28 CFR § 36.211, Sections 4.5.1 and 4.6.3 of the 1991 ADAAG and Sections 302 and 502.4 of the 2010 ADAAG.

Further, Plaintiff's counsel shall be afforded a right to an inspection of the Subject Property within thirty (30) days of the completion of the repairs by Defendant. For said inspection, Plaintiff has the right to retain an expert in the field of ADA compliance to verify that the repairs have been made in accordance with ADA Standards. The retention of Plaintiff's expert shall be at the cost of the Defendant, and Plaintiff shall be compensated for reasonable monitoring fees to ensure that Defendant is in compliance with the ADA.

Dated this the 19<sup>th</sup> day of October, 2022.

Respectfully submitted,

By: /s/ Duncan Strickland

Duncan Strickland

Counsel for Plaintiff

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**Counsel for Plaintiff**

**CERTIFICATE OF SERVICE**

In accordance with Texas Rule of Civil Procedure 21a, I certify that I mailed by certified mail this document to the parties below on October 19, 2022:

*/s/ Duncan Strickland*

THREE STAR VENTURE #2 LLC

C/O Sherali B. Ali

25010 Fairway Springs

San Antonio, TX 78260

Cert. Mail# 9407-1118-9876-5818-6088-25

WGJI13 BUSINESS LLC

C/O BIKARAMJIT SINGH

10393 SAHARA DRIVE

SAN ANTONIO, TX 78216

Cert. Mail# 9407-1118-9876-5818-9390-66